

Division of Advertising Practices **DRAFT 2**
Federal Trade Commission
Judith P. Wilkenfeld, Esq.
Assisant Director 601 Pennsylvania Avenue, N.W.
Room 4114
Washington, DC 20580

Re: FTC File No. 912-3070

Dear Ms. Wilkenfeld:

33 In reference to the special report of Philip Morris for calendar year 1990, as required by the Commission's Order to File Special Report dated January 16, 1991, and the special report for calendar year 1991, as required by the Commission's Order dated April 21, 1992, we offer the following clarification. # 34

During 1990 Philip Morris reformulated the brand reported in the 1990 report as Alpine Long Size. That product, last distributed in November 1990, was a 79 mm product (Long Size). Beginning in November, 1990 we marketed a product that was an 83 mm (King Size) product.

Our review of the special reports and subsequent clarification is prompted by Harold Pillsbury's recent inquiry regarding an apparent discrepancy in the 1991 report. In fact, the TITL figures upon which Mr. Pillsbury relied, reflect testing of the earlier product for which results are lower than the figures we reported for the reformulated product in the 1991 Report. Specifically, with regards to Alpine KFHPMFF and ALpine KFHPML the discrepancies are as follows: for the former PM CO 15, TITL: CO14; for the latter, PM: tar 10, CO 11, TITL: tar 9, CO 10. Even though the TITL figures are lower, we are more comfortable reporting our data for the reformulated brand.

If this clarification suggests to you that revised pages are in order, we would be happy to submit any requested revisions.

Yours sincerely,

Denise F. Keane

Enclosures